

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Chicago Title Insurance Company,
individually and as subrogee of AmTrust Bank,
Wells Fargo Bank, N.A., Bank of America,
N.A. and Minnesota Lending Company;

Plaintiff,

vs.

Sportsmens Contracting, Inc.; Lincoln Homes,
Inc.; Pentagon Real Estate Group, Inc.;
Premier Real Estate Services, LLC; Cushman
Realty, Inc.; Wells Title, LLC; Trend Title,
LLC; Thinh Tran a/k/a Tim Tran; Vince Long
Nguyen; Truong Quang Tran a/k/a Trung
Calvin Tran; Katie Thi Tran; Lua Nguyen;
Vera Solodovnikova; Lien Phuong Thi Tran,
Susanne E. Mathis; and David L. Germain, Jr.;
Derrick A. Johnson; Daniel S. Rollings;
Guarantee Trust & Title Corporation; Rachael
Brabant; Perfection Lending, Inc.; Invescorp,
Inc.; Todd Cushman;

Defendants.

Case No. 11-cv-03314 – SRN/AJB

**STIPULATION TO DISMISS
DEFENDANT VINCE LONG NGUYEN
WITH PREJUDICE, AND FOR
WITHDRAWAL OF ANSWER OF
WELLS TITLE, LLC**

Pursuant to Fed. R. Civ. P. Rule 41(a)(1)(ii), it is hereby stipulated and agreed by and between Plaintiff Chicago Title Insurance Company, individually and as subrogee of AmTrust Bank, Wells Fargo Bank, N.A., Bank of America, N.A. and Minnesota Lending Company (“Plaintiff”), and Defendant Vince Long Nguyen (“V. Nguyen”), through their respective attorneys, that the Plaintiff’s claims against V. Nguyen are hereby dismissed with prejudice, and without costs to either party. This Stipulation does not affect Plaintiff’s claims against any of the remaining Defendants in this action.

Further, Wells Title, LLC hereby stipulates and agrees that its Answer to the Amended Complaint of CTIC, which was earlier served but not filed with the Court, shall be withdrawn, and CTIC shall be permitted to obtain default judgment against Wells Title, LLC in the amount

of \$2,529,734.67 or whatever amount the Court deems appropriate, pursuant to the pending motion for default judgment which is to be heard on May 14, 2013.

Further, V. Nguyen and Wells Title, LLC acknowledge that they have been afforded ample opportunity to consult with counsel, that they have declined to do so, and that they have entered into this Stipulation of their own free will, absent any duress or coercion.

Dated: May 21, 2013.

s/Vince Long Nguyen

Vince Long Nguyen, pro se

Dated: May 21, 2013.

WELLS TITLE, LLC

s/Vince Long Nguyen

By: Vince Long Nguyen

Its: President

1902 7th Avenue East

P.O. Box 512

International Falls, MN 56679

Phone: (218) 417-0295

Dated: May 23, 2013.

MACKALL, CROUNSE & MOORE, PLC

s/Tim A. Staum

Matthew A. Anderson, # 284257

Tim A. Staum, # 0190470

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***Attorneys for Plaintiff Chicago Title
Insurance Company***